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May 8, 2008

John Keeling, PE Department of Ecology Northwest Regional Office 3190 160th Ave. SE Bellevue, WA 98008-5452

RE: Early Action Area 4: Boeing Plant 2/Jorgensen Forge - Property Line Stormwater Lines

Dear Mr. Keeling:

This letter is to report on our findings following our last meeting concerning the Boeing Plant 2 and Jorgensen Forge storm line.

The King County International Airport (Airport) discharges stormwater from drainage from two parking lots to the City of Tukwila's stormwater drainage system. This was confirmed by reviewing City of Tukwila As-builts (Attachment 1) and an inspection video of the 24" drain line performed by the Airport. A copy of the inspection video is enclosed with this letter.

Stormwater is conveyed from the Airport at MH-1-E, westwardly through a 24-inch drain line that discharges to the City's 60" Type II catch basin located at East Marginal Way South.

Catch basin and joint caulk samples that were collected at the Airport in 2001 and 2005 have been reviewed (Attachment 2). The data from these samples were compared to data of samples collected downstream of the airport, which indicated Airport PCB levels were significantly lower than those collected at the Boeing Plant 2/Jorgensen Forge - Property Line Stormwater Lines (Attachment 3).

The 2001 Airport data showed that all caulk and sediment Total PCB concentrations were below MTCA levels (1 mg/kg DW). The 2005 Airport data showed sediment and caulk Total PCB concentrations ranging from about 0.141 mg/kg DW to 2.67 mg/kg DW. In comparison, downstream total PCB samples collected at manholes of 24" line between

Boeing Plant 2 and Jorgensen Forge ranged from 68.0 mg/kg DW to 10,000 mg/kg DW. Total PCB samples at the 12" line (parallel to 24" line) to the Duwamish Waterway ranged from 140 mg/kg DW to 340 mg/kg DW.

In light of the Airport samples already taken and the data comparison with off-site downstream samples, the Airport has no immediate plans to perform additional sampling.

Should you have any questions regarding this letter, please contact me at (206) 296-7427.

Sincerely,

Rick Renaud, P.E.

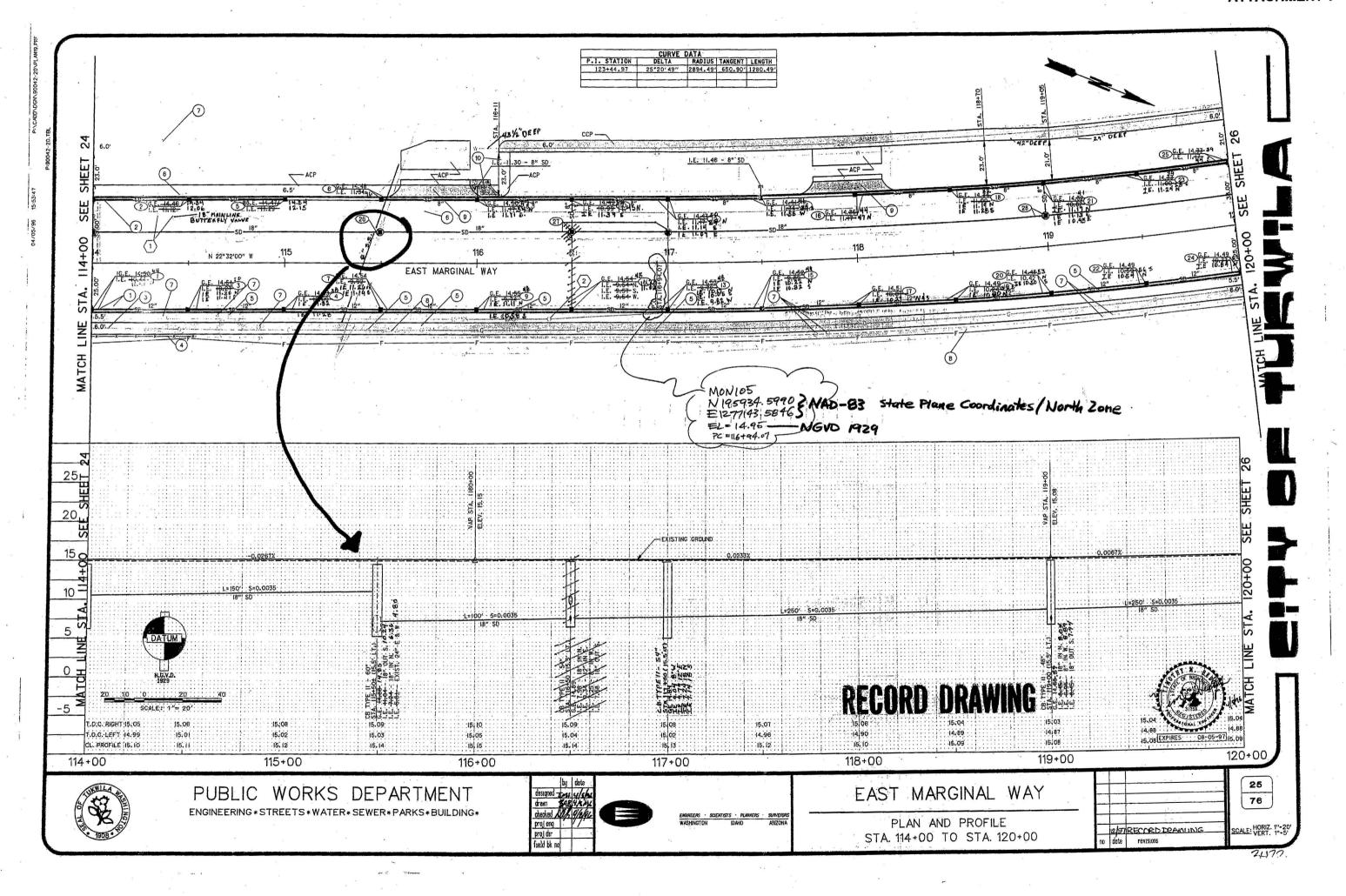
Senior Engineer

Attachments: City of Tukwila Stormwater Plan and Profile As-built

King County International Airport 2001 and 2005 PCB Sample Data

Jorgensen Forge/Boeing Plant 2 Property Line Stormwater Lines 2005 PCB Data

Enclosed: CD – Inspection Video from Airport Manhole MH-1-E to City of Tukwila 60" Type II Catch Basin



Privileged and Confidential Attorney Work Product

Table 1 Catch Basin Sediment and Caulk Sampling - Lots 13 and 14 (2001) King County International Airport Seattle, Washington

1		Concentration ⁸									
Sample Number	Matrix	Arsenic	Barium	Cadmium	Chromium	Mercury	Lead	Selenium	Silver	Aroclor 1254	Aroclor 1260
CB-1-F	Sediment	8.94	172	21.9	78.9	ND (0.532)	276	2.08	ND (0.964)	0.0805	0.121
CB 1802	Sediment	5.25	55.8	2.70	64.8	ND (0.200)	294	ND (0.407)	ND (0.407)	0.0535	0.0539
CB-4-F	Sediment	9.85	89.7	3.94	74.8	ND (0.200)	257	0.419	ND (0.410)	ND (0.025)	ND (0.025)
MH-2-E	Sediment	2.95	30.5	0.411	11.5	ND (0.200)	33.4	ND (0.370)	ND (0.370)	0.528	ND (0.125)
Caulk 1	Caulk	NA	NA	NA	NA	NA	NA	NA	NA	0.392	0.438
Caulk 2	Caulk	NA	NA	NA	NA	NA	NA	NA	NA	0.290	0.461

NOTE: ND = analyte not detected at or above the reporting limit. Reporting limit in parentheses.

NA = not analyzed. Bold indicates detected compound.

^a Concentration of sediment samples reported in mg/kg.

Table

Catch Basin Sediment and Concrete Joint Compound PCB Sampling Results (2005) Lot 12 at King County International Airport Seattle, Washington

Sample	Date		Concentrat	tion (µg/kg)			
Number/Location	Collected	Sample Type	Aroclor 1254	Aroclor 1260	Comments/Observations		
CB-6E	7/22/2005	Sediment	<25.0	190	Approximately 4 inches of sediment in catch basin		
CB-7E	7/22/2005	Sediment	<25.0	250	Approximately 1-2 inches of sediment in catch basin		
CB-9E	7/22/2005	Sediment	<25.0	141	Approximately 3 inches of sediment in catch basin		
Trench 2	7/22/2005	Sediment (comp)	<25.0	2,670	composite sample, < 1 inch of material on bottom		
Trench 3	7/22/2005	Sediment (comp)	<25.0	414	Composite sample, collected from beneath grate before		
	e (*			, i	trench goes beneath parking lot.		
CB-565	5/21/2000	Sediment	<10	50	Sample collected by Boeing from catch basin at south end of trench drain.		
JC-1	7/22/2005	Joint Compound	<25.0	529 ⁽¹⁾	black, varies from competent to highly deteriorated		
JC-2	7/22/2005	Joint Compound	<25.0	171(1)	black, varies from competent to highly deteriorated		
JC-3	7/22/2005	Joint Compound	<25.0	1690 ⁽¹⁾	black, varies from competent to highly deteriorated		
NBF-SP47-001109- H	11/9/2000	Joint Compound	2,200	1,700	Sample collected by Boeing. Located at south end of trench drain.		
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Notes:

Concentrations are on a dry weight basis unless otherwise noted.

⁽¹⁾ Joint compound results are on an as-received (wet weight) basis.

